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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Cellular Telecommunications Industry)	WT Docket No. 98-229
Association's Petition for Forbearance From)	
Commercial Mobile Radio Services Number)	
Portability Obligations)	
)	
and)	
)	
Telephone Number Portability)	CC Docket No. 95-116

COMMENTS ON OPPOSITIONS TO PETITIONS FOR RECONSIDERATION

MCI WorldCom Inc. ("MCI WorldCom") files these comments in reply to the Oppositions to Petitions for Reconsideration filed by AT&T Wireless Services, Inc. ("AT&T"), the Cellular Telecommunications Industry Association ("CTIA") and the Telecommunications Resellers Association ("TRA") in the matter of the *Memorandum Opinion and Order* in this proceeding.¹

AT&T claims the wireless industry has set an "extremely rigorous"² deployment schedule to meet the November 24, 2002 wireless LNP deadline, yet neither it nor any carrier in the wireless industry has publicly committed to a schedule with identifiable milestones like individually identified wireline carriers did. Despite its "rigorous" plans, AT&T nonetheless opposes any of the reasonable reporting requirements suggested by MCI WorldCom that would alert the Commission and the North American Numbering

¹ Cellular Telecommunications Industry Association's Petition for Forbearance from Commercial Mobile Radio Services Number Portability Obligations, Memorandum Opinion and Order, WT Docket No. 98-229, CC Docket No. 95-116 (adopted February 8, 1999; rel. February 9, 1999).

² AT&T Wireless Services, Inc. Opposition.

Council to problems or foot-dragging by individual carriers. AT&T opposes the reinstatement of the March 2000 LNP implementation deadline for wireless carriers as well as any suggestion that wireless carriers participate in number pooling prior to full wireless LNP. AT&T further claims that wireless LNP is not needed to protect consumers, or to insure just, reasonable and not unreasonably discriminatory rates.

CTIA also opposes any reporting requirements. According to CTIA, the Commission has since recognized that the value of number portability to wireless consumers may have been overstated.³ Further, CTIA says that any consideration of wireless LNP forbearance should ignore any number exhaust or number conservation issues.

AT&T and CTIA have it wrong. As specified in the MCI WorldCom petition, there is no evidence that the wireless industry was working toward implementation of the prior deadlines. Indeed, there was evidence to the contrary. A deployment schedule with milestones is needed to insure wireless LNP implementation moves forward.

The value of wireless LNP to protect consumers and increase all forms of wireless competition continues to grow. The Commission has never strayed from the position that competition and choice are the best protection for consumers. Wireless LNP will become even more critical for consumers with future Commission initiatives such as calling party pays. There is no basis for the Commission to disregard the importance of the wireless industry in number optimization efforts. Wireless carriers obtain blocks of ten thousand numbers, and the number exhaust crisis facing the Commission derives from area code exhaust, not individual telephone number assignment as wireless carriers would have

³ CTIA Opposition to Petitions for Reconsideration.

regulators think. Telephone number utilization is a banner waved by the wireless industry to try to sidestep its role in being part of the solution of efficient number administration. The NANPA (North American Numbering Plan Administrator) number exhaust study showed that with the participation of all carriers numbering plan expansion could be delayed for quite a few years. Further, it is undeniable that in area code jeopardy and rationing situations the ability of all carriers to take one thousand numbers instead of ten thousand number blocks will stave off exhaust.

Obviously, public reporting requirements commit carriers to action, and that's the rub for AT&T and CTIA. For the reasons given, MCI WorldCom urges the Commission to require a public deployment schedule with milestones and to grant TRA's and MCI WorldCom's petitions to reinstate the March 31, 2000 deadline for wireless LNP implementation.



Anne F. La Lena
Henry G. Hultquist
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-3847

Date: July 8, 1999

CERTIFICATE OF SERVICE

I, Barbara Nowlin, hereby certify that a copy of the foregoing Comments on
Oppositions to Petitions for Reconsideration of MCIWorldCom filed in WT Docket 98-229, CC
Docket No. 95-116 was served on this 8th day of July by first class mail upon the following:

Honorable William E. Kennard**
Federal Communications Commission
The Portals
445 12th Street, S.W.
8th Floor
Washington, DC 20554

Harold Furchgott-Roth**
Federal Communications Commission
The Portals
445 12th Street, S.W.
8th Floor
Washington, DC 20554

Susan Ness**
Federal Communications Commission
The Portals
445 12th Street, S.W.
8th Floor
Washington, DC 20554

Michael Powell**
Federal Communications Commission
The Portals
445 12th Street, S.W.
8th Floor
Washington, DC 20554

Gloria Tristani**
Federal Communications Commission
The Portals
445 12th Street, S.W.
8th Floor
Washington, DC 20554

Kevin Gallagher
Sr. Vice President and General Counsel
360 Communications Co.
8725 W. Higgins Road
Chicago, IL 60631

Richard Metzger
Emily M. Williams
ALTS
888 17th Street, N.W., Suite 900
Washington, D.C. 20006

John T. Scott, III
Crowell & Moring
1001 Pennsylvania Ave., N.W.
Washington, D.C. 20004
(for Bell Atlantic Mobile)

M. Robert Sutherland
Theodore Kingsley
Bell South
1155 Peachtree Street, Suite 1700
Atlanta, GA 30309-3610

Michael F. Atschul
Randall Coleman
Cellular Telecommunications Industry Assoc.
1250 Connecticut Ave., N.W., Suite 200
Washington, D.C. 20036

Susan Smith
Director, External Affairs
Century Cellunet, Inc.
3505 Summerhill Road
No. 4 Summer Place
Texarkana, TX 75501

Andre J. Lachance
GTE Service Corp.
1850 M Street, N.W., Suite 1200
Washington, D.C. 20036

Robert S. Foosaner
Nextel
1450 G Street, N.W., Suite 425
Washington, D.C. 20005

William S. Roughton, Jr.
Associate General Counsel
Primeco Personal Communications
601 13th Street N.W.
Suite 320 South
Washington, D.C. 20005

Jeanne A. Fischer
Senior Counsel
Southwestern Bell Mobile Systems
13075 Manchester Road
St. Louis, MO 63131

Caressa D. Bennet
Dorothy F. Cukier
Bennet & Bennet
1019 19th Street, N.W., Suite 500
Washington, D.C. 20036
(for Rural Telecommunications Group)

Pamela J. Riley
Vice President, Federal Regulatory
1818 N Street, N.W., Suite 900
Washington, D.C. 20036

Elizabeth Sachs
Lukas, Nace, Gutierrez & Sachs
1111 19th Street, N.W., 12th Floor
Washington, D.C. 20036
(for American Mobile Telecommunications
Assn.)

Dean Proctor
Vice President Regulatory Affairs
Microcell Telecommunications, Inc.
1250 Rene-Levesque Blvd. West
4th Floor
Montreal, Quebec
Canada H3B 4W8

Judith St. Ledger-Roty
Kelley Drye & Warren
1200 19th Street, Suite 500
Washington, D.C. 20036
(for Paging Network, Inc.)

Peter M. Connolly
Koteen & Naftalin
1150 Connecticut Ave., N.W.
Washington, D.C. 20036
(for United States Cellular Corp.)

William J. Sill
Jill Canfield
Evans & Sill
919 18th Street, N.W.
Suite 700
Washington, D.C. 20006
(for Upstate Cellular Network)

Linda L. Oliver
Hogan & Hartson, L.L.P.
555 Thirteenth St., N.W.
Washington, D.C. 20004
(for Telecommunications Resellers Association)

David Gusky
Telecommunications Resellers Association
1401 K Street, N.W.
Washington, D.C. 20005

International Transcription Services, Inc.**
1231 20th Street
Washington, DC 20037

**Hand Delivery


Barbara Nowlin